

**ZENO B. BAUCUS**  
**BRYAN T. DAKE**  
**BENJAMIN D. HARGROVE**  
Assistant U.S. Attorneys  
U.S. Attorney's Office  
2601 Second Avenue North  
Suite 3200  
Billings, MT 59101  
Phone: (406) 657-6101  
FAX: (406) 657-6989  
E-mail: zeno.baucus@usdoj.gov  
bryan.dake@usdoj.gov  
benjamin.hargrove@usdoj.gov

**FILED**

APR 07 2022

Clerk, U.S. District Court  
District Of Montana  
Great Falls

**ATTORNEYS FOR PLAINTIFF**  
**UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF MONTANA**  
**GREAT FALLS DIVISION**

<b>UNITED STATES OF AMERICA,</b>	<b>CR 22-25 -GF-BMM</b>
<b>Plaintiff,</b>	<b>INDICTMENT</b>
<b>vs.</b>	<b>FALSE DECLARATION BEFORE</b>
<b>ELISE HAZEL ANNE VOPEL,</b>	<b>GRAND JURY</b>
<b>Defendant.</b>	<b>Title 18 U.S.C. § 1623</b> <b>(Penalty: Five years of imprisonment,</b> <b>\$250,000 fine, and three years of supervised</b> <b>release</b>

THE GRAND JURY CHARGES:

On or about August 7, 2019, at or near Great Falls and within Cascade County, in the State and District of Montana, the defendant, ELISE HAZEL ANNE VOPEL, while under oath and testifying in a proceeding before a grand jury of the United States, sitting in Great Falls, Montana, knowingly made false material declarations and omissions as set forth in the following answers related to an assault with a firearm occurring at the Extended Stay Hotel in Billings, Montana in May 2019, that she was directly involved in, thereby falsely identifying the two individuals involved in the assault in May 2019.

At the time and place aforesaid, the grand jury was conducting an investigation to determine whether violations of 18 U.S.C. §§ 922(g), 924(c), and 1591 had been committed, and to identify the persons who had committed, caused the commission of, and conspired to commit such violations. It was material to the said investigation that the grand jury ascertain the correct identification of the two individuals involved in the assault in May 2019. In conducting its investigation, the defendant, ELISE HAZEL ANNE VOPEL, knowingly provided the following false statements,

Q. Were you aware of a time where the two of them [John Doe 1 and John Doe 2] were involved in threatening any individuals at a hotel?

A. Yes.

Q: Can you describe that for the Grand Jury, please?

A. So we were at a hotel and there was a call that came in which is, you know, somebody who wants to pay for sex and he -- I don't even remember. I don't think, he didn't have the money or was trying to hurt my friend and they ended up holding him at gunpoint in the hotel just because he was trying to get it without paying.

...

Q. Let's talk about the first incident. You said that they had guns. Who had guns?

A. [John Doe 1 and John Doe 2].

Q. And what were they doing with the guns during that first incident?

A. So the first one they actually didn't hit him or anything, they just held up the guns at him. They just like pointed them at him and he, they just kind of said like, you know, "Do you really think you can get something without paying?" Just kind of trying to intimidate him, trying to scare him. The guy just stood there. He was really big. He was a really big dude. He stood there and held his hands up and he was like, "I don't know what you're talking about. I don't know what you're talking about." But we knew it was him that was the right guy.

...

Q. So this occurred right off of the elevator. Do you recall, Ms. Vopel, or can you recall at this time what hotel it was that you were at?

A. The Extended Stay.

The aforesaid testimony of ELISE HAZEL ANNE VOPEL, as she then and there well knew and believed, was false in that, ELISE HAZEL ANNE VOPEL knew that neither John Doe 1 or John Doe 2 had been involved in the assault with a firearm at the Extended Stay in Billings in May 2019 and that John Doe 3 and John Doe 4 were the individuals who were at the hotel with her and engaged in the described assault with a firearm and she falsely omitted the correct identification of these individuals from her testimony to the federal grand jury.

All in violation of 18 U.S.C. § 1623.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON

  
LEIF M. JOHNSON  
United States Attorney  
JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney